

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

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In re:

USA GYMNASTICS,

Debtor.

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Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF APPEAL**

Liberty Insurance Underwriters Inc. (“LIU”) appeals to the United States District Court for the Southern District of Indiana from the Findings of Fact, Conclusions of Law, and Order Confirming the Modified Third Amended Joint Chapter 11 Plan of Reorganization Proposed by USA Gymnastics and the Additional Tort Claimants Committee of Sexual Abuse Survivors entered on December 16, 2021, in the above-captioned case (ECF 1776). A copy of that Order is attached as exhibit A.

**Part 1: Identify the appellant(s)**

1. Name of appellant: Liberty Insurance Underwriters Inc.
2. Position of appellant in the adversary proceeding or bankruptcy case that is the subject of this appeal: LIU is a party in interest in the case and an insurer of the debtor USA Gymnastics.

**Part 2. Identify the subject of this appeal.**

1. Describe the judgment, order, or decree appealed from: Findings of Fact, Conclusions of Law, and Order Confirming the Modified Third Amended Joint Chapter 11 Plan of Reorganization Proposed by USA Gymnastics and the Additional Tort Claimants Committee of Sexual Abuse Survivors (ECF 1776).
2. State the date on which the judgment, order, or decree was entered: December 16, 2021.

### **Part 3: Identify the other parties to the appeal**

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):

Party	Attorney
Liberty Insurance Underwriters Inc., Appellant	Ronald P. Schiller Matthew A. Hamermesh Bonnie M. Hoffman HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER One Logan Square, 27th Floor Philadelphia, PA 19103-6933 (215) 568-6200 (telephone) (215) 568-0300 (facsimile) rschiller@hangley.com; mhamermesh@hangley.com; bhoffman@hangley.com  Ginny L. Peterson KIGHTLINGER & GRAY, LLP One Indiana Square, Suite 300 211 North Pennsylvania Street Indianapolis, Indiana 46204 (317) 638-4521 gpeterson@k-glaw.com
USA Gymnastics	Catherine L. Steege Dean N. Panos Melissa M. Root Adam T. Swingle JENNER & BLOCK LLP 353 N. Clark Street Chicago, Illinois 60654 (312) 222-9350 csteegen@jenner.com dpanos@jenner.com mroot@jenner.com aswingle@jenner.com

Additional Tort Claimants  
Committee of Sexual Abuse Survivors

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**Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)**

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

Not applicable in this District.

**Part 5: Sign below**

HANGLEY ARONCHICK SEGAL PUDLIN &  
SCHILLER

Dated: December 17, 2021

By: /s/ Ronald P. Schiller  
Ronald P. Schiller (admitted *pro hac vice*)  
Matthew A. Hamermesh (admitted *pro hac vice*)  
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*Counsel for Liberty Insurance Underwriters Inc.*

**CERTIFICATE OF SERVICE**

I, Ronald P. Schiller, certify that on December 17, 2021, I caused Liberty Insurance Underwriters Inc.'s Notice of Appeal to be electronically filed via the Court's CM/ECF System, which provided notice to all counsel of record. Parties may access this filing through the Court's electronic filing system.

HANGLEY ARONCHICK SEGAL PUDLIN &  
SCHILLER

/s/ Ronald P. Schiller  
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Dated: December 17, 2021

*Counsel for Defendant Liberty Insurance  
Underwriters Inc.*